

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ABRHAM ITUAH,

Plaintiff,

v.

CITY OF PHILADELPHIA, et al.

Defendants.

Case Number
19-cv-5088

REC'D MAR 23

PLAINTIFFS' INITIAL DISCOVERY DISCLOSURE

Pursuant to Federal Rule of civil procedure 26(a), Plaintiff Abraham Ituah provides the following information as required by the rule.

Fed.R.C.P. 26(a)(1)A

Plaintiff identify the following persons have discoverable information that may support my claims in the above captioned matter. Plaintiff reserve the right to supplement this information when necessary.

1. James J. Zwolak - Head of Tax Default
2. Stavrakis Cynthia- Tax Default Solicitor
3. Brendan J. Philbin - City Solicitor
4. Joe Doe (Police officer) - PPD
5. Pamela Thurmond - Deputy City Solicitor
6. Joseph Carroll - license & inspection
7. Carmen Sanchez - Tax Analyst II
8. Roslyn Spelle - Revenue Supervisor
9. Steven Wakefield - City Solicitor

All of the above city staffs shall be served production of documents and interrogatories for responses via the city Deputy attorney, Michael Pfautz, law department, one Parkway Building, 1515 Arch Street, 15th floor, Philadelphia PA 19102-1595, telephone 215 683 5253. There responses are required before trial.

Fed. R.C.P. 26(a)(1)(A)(ii):

Plaintiff exhibits and pleadings in connection with the pending matter supported my claims as well as bills and other documents justifying unfair treatments and

retaliation. As discovery in this matter is continuing, Plaintiff reserve the right to add or supplement supplement information

Fed. R.C.P. 26(a)(1)(A):

Plaintiff testimony at the hearing and the exhibits presented were issued by expert hired to conduct the inspection of the building before the building was demolished. The report suggested only repairs was drafted by expert with P.hD holder in structural engineering. Plaintiff reserve the right to supplement this information as required.

Respectfully Submitted,



Abraham Ituah

Date: 3/23/2023

PLAINTIFF


CERTIFICATE OF SERVICE

I, Abraham Ituah, Plaintiff certify that on this date, a true and correct copy of the Plaintiff initial Disclosure is to be served on the following via email and mail:

TO:

Michael Pfautz Esquire
Philadelphia city law department,
one Parkway Building, 1515 Arch Street, 15th floor,
Philadelphia PA 19102-1595,
telephone 215 683 5233

Date: March 23, 2023



Abraham Ituah
Plaintiff